

LAW OFFICES
GREENBLUM & BERNSTEIN, P.L.C.
PATENT, COPYRIGHT AND TRADEMARK MATTERS
1950 ROLAND CLARKE PLACE
RESTON, VA 20191-1411
TEL: (703) 716-1191
FAX: (703) 716-1180
EMAIL: gbpatent@gbpatent.com
www.gbpatent.com

NEIL F. GREENBLUM
BRUCE H. BERNSTEIN
JAMES L. ROWLAND
ARNOLD TURK A
MICHAEL J. FINK
STEPHEN M. ROYLANCE ◊
ROBERT W. MUELLER
WILLIAM E. LYDDANE
WILLIAM S. BOSHNIK *
PAUL A. BRAIER, Ph.D.
P. BRANKO PEJIC *
JOHN PRETA *
DANIEL B. MOON
BRUCE H. STONER, JR. ◊
ENOCH PEAVEY
SEAN C. MYERS-PAYNE, Ph.D.
JONATHAN R. MILLER *
STEVEN B. POLLICOFF *
BARRY I. HOLLANDER ◊
GARY V. HARKCOM *◊
JAMES P. BONNAMY
JILL M. BROWNING

WALTER SCHLAPKOHL, Ph.D.
NAOKO OHASHI *
HARRY J. GWINNELL ◊
JEFFREY H. HANDELSMAN *
KENNETH H. SALEN ◊
SOK K. HONG ◊
TAI KONDO ◻
JEFFREY R. BOUSQUET ◊
GARY M. JACOBS ◊
JAMES A. GROMADA
SHAWN A. HAMIDINIA, Ph.D.
ALI M. IMAM *
CHAD E. GORKA
CHUONG T. NGUYEN *
JAMES A. DONEGAN ◻

* ADMITTED TO A BAR
OTHER THAN VA
◻ REGISTERED PATENT AGENT
◊ OF COUNSEL
△ SENIOR COUNSEL

November 10, 2020

VIA ECF and E-Mail

The Honorable Vernon S. Broderick
United States District Court
for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

**Re: *Spectrum Dynamics Medical Limited v. General Electric Company, et al.,*
Civil Action No. 18-cv-11386 (VSB)**

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B of your Honor’s Individual Rules & Practices in Civil Cases to respectfully request permission to file Plaintiff Spectrum Dynamics Medical Limited’s Memorandum Of Law In Support Of Its Motion For Leave To File A Sur-Reply In Further Opposition To Defendants’ Motion To Dismiss In Part Plaintiff’s Compulsory Counterclaims [D.I. 108] as well as Exhibits 2 and 3 to the Pejic Declaration under seal and in redacted form.

Plaintiff’s requested redactions are limited to several quotations and references to a document (Exhibit 4 to the Declaration of P. Branko Pejic) produced by Defendants and designated as “Highly Confidential-Attorneys’ Eyes Only”. Additionally, Plaintiff requests leave to file Exhibit 4 in its entirety under seal.

Plaintiff’s counsel has conferred with Defendants’ counsel, with Defendants’ requested redactions reflected in the instant request.

The Honorable Vernon S. Broderick November 10, 2020

Page -2-

Plaintiff's proposed redactions are highlighted in blue in the enclosed copy of Plaintiff Spectrum Dynamics Medical Limited's Memorandum Of Law In Support Of Its Motion For Leave To File A Sur-Reply In Further Opposition To Defendants' Motion To Dismiss In Part Plaintiff's Compulsory Counterclaims [D.I. 108] as well as Exhibits 2 and 3 to the Pejic Declaration.

For the aforementioned reasons, Plaintiff respectfully requests permission from this Court to file Plaintiff Spectrum Dynamics Medical Limited's Memorandum Of Law In Support Of Its Motion For Leave To File A Sur-Reply In Further Opposition To Defendants' Motion To Dismiss In Part Plaintiff's Compulsory Counterclaims [D.I. 108], and Exhibits 2-4 to the Pejic Declaration under seal and in redacted form.

Respectfully submitted,

/s/ Neil F. Greenblum

Neil F. Greenblum

cc: All counsel of record (via email and ECF)